

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION,	§	
	§	
<i>Plaintiff,</i>	§	
	§	
AND	§	
	§	
ALFREDO GARCIA, ANA TREVINO,	§	
FRANCISCO ANDRADE, JOSE	§	
ARREAZA, AVILIO ARRIAZA, ALMA	§	
BALDERAS, ANGELICA CORTES,	§	
ISRAEL FLORES, JOSE FLORES,	§	
VICTOR FLORES, MIGUEL GAMEZ,	§	NO: 5:18-CV-00990-JP
TOMAS GALVAN, VICTOR GUEVARA,	§	
ADRIAN GUILLEN, CLEOFAS HINOJOSA,	§	
SERGIO IRETA, JAIME LEAL, VERONICA	§	
NAVARRETE, MIGUEL PEREZ, ERICK	§	
RUIZ, ERNESTO VASQUEZ RUBIO,	§	
GUILLERMO VITELA, SERGIO PAZ, AND	§	
SERGIO VITELA,	§	
	§	
<i>Plaintiff-Intervenors,</i>	§	
	§	
vs.	§	
	§	
DH SAN ANTONIO MANAGEMENT, LLC,	§	
ET AL.,	§	
	§	
<i>Defendants.</i>		

**JOINT MOTION TO STAY PROCEEDINGS AND REQUEST
FOR EXPEDITED RULING**

Plaintiff Equal Employment Opportunity Commission (“EEOC”), Intervenors, and Defendants, hereby jointly move the Court for a 30-day stay of litigation in order to allow the parties additional time to continue negotiating terms of resolution. The parties also request an expedited ruling on this motion. In support of this motion, the parties state as follows:

1. On July 18, 2019, the parties participated in a full day of mediation with mediator Michael Curry. The parties, with Mr. Curry's assistance, have reached agreement on monetary terms of resolution, and are in the final stages of negotiating the terms of the proposed consent decree. The parties require more time to finalize the remaining terms and believe a thirty (30) day stay of litigation would best facilitate settlement.
2. The Court has set a hearing for Intervenor's Motion to Compel for September 5, 2019.
3. The parties believe that a stay of proceedings, including the hearing on the motion to compel, would be the most efficient use of government and judicial resources.

WHEREFORE, the Parties respectfully request that the Court stay the proceedings pending settlement.

Respectfully submitted,

GWENDOLYN YOUNG REAMS
Associate General Counsel

ROBERT A. CANINO
Regional Attorney
Oklahoma State Bar No. 011782

EDWARD JUAREZ
Supervisory Trial Attorney
Texas State Bar No. 24014498
Email: eduardo.juarez@eeoc.gov

/s/ Philip Moss
PHILIP MOSS
Trial Attorney
Texas State Bar No. 24074764
Email: philip.moss@eeoc.gov

EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION
San Antonio Field Office
5410 Fredericksburg Rd., Suite 200
San Antonio, Texas 78229-3555
Telephone: (210) 281-7636
Facsimile: (210) 281-7669

Jackson Lewis PC

By:

Michael J. DePonte s/w/p
Paul E. Hash (SBN 09198020)
Paul.Hash@jacksonlewis.com
Michael J. DePonte (SBN 24001392)
Alise Abel (SBN 24082596)
JACKSON LEWIS P.C.
500 N. Akard, Suite 2500
Dallas, Texas 75201
PH: (214) 520-2400
FX: (214) 520-2008

Attorneys for Defendants

The Espinoza Law Firm

Javier Espinoza s/w/p
Javier Espinoza
Texas Bar No. 24036534
Javier@espinozalawfirm.com
Lara Brock
Lara@espinozalawfirm.com
Texas Bar No. 24085872
ESPINOZA LAW FIRM, PLLC
10202 Heritage Blvd.
San Antonio, Texas 78216
210.229.1300
210.229.1302

ATTORNEYS FOR INTERVENORS

CERTIFICATE OF SERVICE

I hereby certify that on August 27, 2019, I presented the foregoing document with the Clerk of the Court for filing and uploading to the CM/ECF system, which will send notification of such filing to the following at their e-mail addresses on file with the Court:

Paul E. Hash (SBN 09198020)
Paul.Hash@jacksonlewis.com
Michael J. DePonte (SBN 24001392)
Alise Abel (SBN 24082596)
JACKSON LEWIS P.C.
500 N. Akard, Suite 2500
Dallas, Texas 75201
PH: (214) 520-2400
FX: (214) 520-2008
ATTORNEYS FOR DEFENDANTS

Javier Espinoza
Texas Bar No. 24036534
Javier@espinozalawfirm.com
Lara Brock
Lara@espinozalawfirm.com
Texas Bar No. 24085872
ESPINOZA LAW FIRM, PLLC
2211 Danbury Street
San Antonio, Texas 78217
210.229.1300
210.229.1302
ATTORNEYS FOR INTERVENORS

/s/ Philip Moss

Philip Moss
Attorney for Plaintiff